



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

AAS  
F. #2014R01413

271 Cadman Plaza East  
Brooklyn, New York 11201

October 20, 2015

By Federal Express and ECF

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Re: United States v. Abdurasul Juraboev, et al.  
Criminal Docket No. 15-95 (WFK)

Dear Counsel:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government hereby furnishes additional discovery with respect to the above-referenced case. The enclosed discovery is being produced pursuant to the Stipulations and Protective Orders entered by the Court with respect to each defendant. Enclosed are discs, Bates-numbered 1000 and 1001, containing the following materials:

1. Subpoena returns for Abror Habibov from Facebook, Ebay, Paypal, Equifax, Experian, Moneygram, T-Mobile, TransUnion, and Yahoo;
2. Subpoena returns for Abdurasul Juraboev from Cablevision, T-Mobile, Google, Federal Reserve Bank, and Western Union;
3. Subpoena returns for Dilkyot Kasimov from Orbitz and T-Mobile;
4. Subpoena returns for Akhror Saidakhmetov from T-Mobile, Facebook, Sprint, Google, and Cablevision;

5. Subpoena returns for Akmal Zakirov from AT&T;
6. Text messages gathered through the investigation; and
7. Redacted transcripts of various telephonic communications gathered through the investigation.

Any additional discovery will be provided to you as it becomes available. Additionally, please provide at your earliest convenience a one terabyte hard drive to government counsel, so that additional electronic discovery can be copied and produced to you in short order. The government hereby also requests reciprocal discovery.

If you have any questions or further requests, please do not hesitate to contact me.

Very truly yours,

ROBERT L. CAPERS  
United States Attorney

By: /s/ Alexander A. Solomon  
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Enclosures

cc: Clerk of the Court (WFK) (by ECF) (without enclosures)